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BY ECF

HONORABLE RAYMOND J. DEARIE
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)

This letter is respectfully submitted to request a modification of the motion and trial schedules in this case.

This past Friday, Judge Ross rescheduled a racketeering, murder, drugs and firearms trial from Feb 10 to April 28 due to the government's recent superseding indictment, adding a fourth murder and a fourth attempted murder to the already loaded RICO predicates and multiple murders charged in that case. The trial is expected to take between 6 and 8 weeks. That puts it squarely in an overlap with the scheduled early June trial in this case, as I advised Judge Ross when I asked her to use her good offices with Judge Dearie to intercede, if necessary, on my behalf as a result of this recent and unexpected scheduling conflict.

In addition, there is a virtual cornucopia of virtual and tangible discovery, much, but not all, of which I have familiarized myself with, that I must continue to review with my client, before I can complete and file his pretrial motions. These motions address the voluntariness of his post arrest statements as well as a Massiah violation resulting from the government's insinuation of a jailhouse informer, at times assisted by a hidden recording device, in discussing all aspects of the indicted charges with my client. These motions will likely require evidentiary pre-trial hearings.

Ms. Stafford has just filed a notice of appearance as Ms. Henry's counsel. She and I have conferred about asking for a status conference next week, any time from Tuesday afternoon to the end of the week that is convenient for the Court and counsel, to set a modified motion and trial schedule. I have sent the substance of this letter to government counsel this morning for

his response, but I have not yet heard back from him. Given the present filing date for defense motions is this coming Monday, January 27th, I am submitting this letter because it is the end (for some folks, not me) of the business day.

I thank Your Honor for your courtesy and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ephraim Savitt', with a long horizontal flourish extending to the right.

Ephraim Savitt

cc: AUSA Tyler Smith
Ying Stafford, Esq.
Bebars Baslan